



United States Attorney
Southern District of New York

MEMO ENDORSED

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 17, 2006

BY FACSIMILE

Honorable Kenneth M. Karas
United States District Judge
United States Courthouse
500 Pearl Street, Room 920
New York, New York 10007

USDC SDNY
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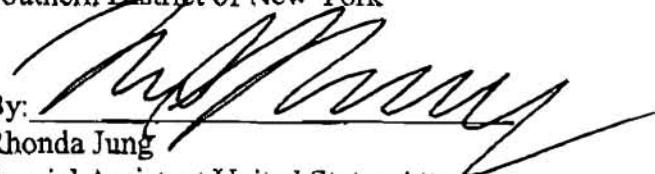
**Re: United States v. Alberto Vilar and Gary Tanaka
05 Cr. 621 (KMK)**

Dear Judge Karas:

The parties respectfully propose the following briefing schedule to resolve any privilege issues concerning the U.S. documents: Any motion by the Government due on May 25, 2006, response by the defendants due on June 8, 2006, and the Government's reply, if any, due no later than June 15, 2006.

Respectfully submitted,

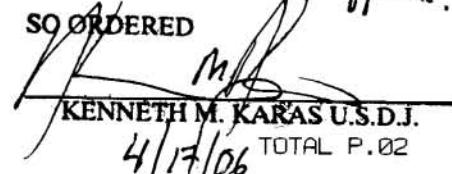
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cc: Glenn Colton, Esq./Jessica Margolis, Esq.
Jeffrey Hoffman, Esq.
Eugene Licker, Esq./Amanda Merkur, Esq.

The briefing schedule regarding any privilege issues related to US documents is approved.

SO ORDERED


KENNETH M. KARAS U.S.D.J.

4/17/06 TOTAL P.02